



UPPER ARKANSAS
WATER CONSERVANCY
DISTRICT

Filed Electronically

June 24, 2010

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Subject: Public Notice DA 10-1035
OFFICE OF ENGINEERING AND TECHNOLOGY
REQUESTS INFORMATION ON USE OF 1675-1710 MHz BAND

ET Docket No. 10-123

To whom it may concern:

The Upper Arkansas Water Conservancy District submits the following comments regarding the subject request:

Identity of non-federal entities accessing subject:

The Upper Arkansas Water Conservancy District is a Colorado State Public entity formed pursuant to Colorado Statutes. It serves the citizens of the Upper Arkansas Basin, more than 26,268 square mile watershed to provide raw water services such as reservoir storage and water right protection. It operates and maintains satellite linked water monitoring systems at 6 reservoir and 9 stream gauge sites in the Upper Arkansas Basin. These sites were installed beginning in 2008 and this network will be complete by September 30, 2010. The data is transmitted from data collection platforms in remote mountain locations to the NOAA GOES West satellite. The data is then down-linked to the NOAA GOES DCS at Wallops Island VA. The raw satellite data is then rebroadcast via the internet where the raw data stream is captured, processed and published to a public website.

Description of purpose of use:

The program objective is to generate accurate and timely data for improved water resource management. The objective is to monitor water data at 15 locations in remote high mountain areas as well as tributary streams. The data is used to minimize conflicts surrounding increasing demand among the District's sometimes competing uses, such as irrigation, municipal storage, domestic and commercial augmentation, and water leases and in stream flows. Accurate and timely information is used to increase water use efficiency by capitalizing upon the opportunities for water exchanges and transfers. Often these opportunities are narrow windows of less than three hours. This data is shared with other local and state agencies, such as the Colorado Department of Natural Resources, Division of Water Resources. Likewise the water data gathered and disseminated by the State of Colorado through the Colorado Division of Water Resources is utilized by the Water District as a decision and planning tool and is vital to the District's operations. The District is responsible for the provision of water augmentation for nearly 2000 structures and this number is increasing daily.

The district is planning and has invested in equipment capabilities to remotely operate actuators at some of its reservoirs. This would require bidirectional communication with the GOES satellite. It is our understanding that a sell-off of some of the subject band could negatively impact this ability. The district has invested in this technology and that investment could be lost with this sell-off.

Which portions of the subject band is used:

The District relies upon the Direct Readout Ground Station at Wallops and receives the raw data via the LRGS data collection system.

Frequency of use:

Data are transmitted from each remote site to the GOES satellite on an hourly basis every day.

Estimate of current investment:

The equipment cost and installations are estimate at \$815,000. The human resources involved in maintenance and data processing is approximately \$70,000 per year. The value of historical data is enormous and immeasurable. This information (historic 20 years) is valuable in determining and preventing negative impacts from changes of water use, such as changing use from irrigation to municipal and domestic. The District's equipment is newly acquired (one to two years old).

Ability to obtain data from different services:

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Notwithstanding the cost to reprogram and/or reequip all sites, these sites are remote and prior to installation alternatives were investigated and it was determined in most areas that other alternatives were not viable. If alternatives were viable they were marginal at best and at a greater cost.

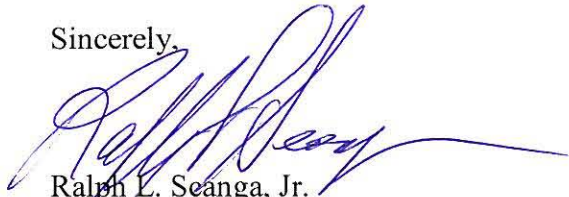
Possibility of utilizing GOES satellite telemetry at a few sites and distributing via terrestrial services:

At this time most of our uses are for transmitting not receiving from the GOES satellite. However since our sites are wide spread across the Upper Arkansas Basin, it would be difficult if not impossible to aggregate the data and utilize fewer channels. Also, the remoteness and distance between sites would make receiving at centralized locations and retransmitting unsuitable.

The Upper Arkansas Water Conservancy District requests the FCC to exercise extreme caution and evaluates all avenues prior to committing to a reduction in the services provided in this band. This is vitally important in the preservation of water resources in Colorado and the West.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ralph L. Seanga, Jr.", with a long horizontal flourish extending to the right.

Ralph L. Seanga, Jr.
General Manager

Cc:

U.S. Senator Mark Udall

Congressman Doug Lamborn